

EXHIBIT C

Bonner, Kelly

From: Priselac, Jessica
Sent: Monday, December 21, 2020 12:04 PM
To: 'Christopher Geddis' <CGeddis@mazieslater.com>
Cc: Adam Slater <ASlater@mazieslater.com>; Cheryll Calderon <ccalderon@mazieslater.com>; Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Ferretti, Joseph S. <JSFerretti@duanemorris.com>
Subject: RE: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, No. 1:19-md-02875

Counsel,

We do not agree to your filing these documents on ECF. Once again, you have not followed the Protective Order with regard to challenging their confidentiality, nor have you provided us with sufficient time to evaluate your request. Also, as ZHP's products were recalled more than two years ago, there is no public safety concern. You may email these documents to Judge Schneider, in connection with filing your submission.

Best regards,

Jessica Priselac
Attorney at Law

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From: Christopher Geddis <CGeddis@mazieslater.com>
Sent: Monday, December 21, 2020 11:53 AM
To: Priselac, Jessica <JPriselac@duanemorris.com>; Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Ferretti, Joseph S. <JSFerretti@duanemorris.com>
Cc: Adam Slater <ASlater@mazieslater.com>; Cheryll Calderon <ccalderon@mazieslater.com>
Subject: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, No. 1:19-md-02875

Counsel,

We will be using the following documents as exhibits to the agenda letter regarding the December 22, 2020 Case Management Conference.

- (1) PRINBURY00129588 – Response to an FDA inspection observation.
- (2) ZHP00076700 – Email regarding an organization chart of ZHP.
- (3) ZHP00076708 – The attached organization chart.

- (4) PRINSTON00083640 – FDA inspection report.
- (5) PRINSTON00077836- Module: 3.2.A of ZHP's Valsartan.
- (6) ZHP00004937 – ZHP Organization Chart.
- (7) PRINSTON00082994– FDA inspection report.
- (8) ZHP00107709– FDA inspection report.
- (9) PRINSTON0074125– FDA inspection report.
- (10) PRINSTON00083026– FDA inspection report.
- (11) PRINSTON00081549– FDA inspection report.
- (12) ZHP00005780– List of attendings at FDA meeting.
- (13) PRINSTON00081570– FDA inspection report.
- (14) ZHP0000215 – Contract between ZHP and Shanghai Syncores regarding the development of a new Valsartan manufacturing process.
- (15) ZHP02579748 - API process optimization meeting minutes.
- (16) ZHP00494048 - Protocol of Valsartan API Recall (Foreign grade).
- (17) PRINSTON00162373 – FDA inspection report.
- (18) ZHP00476678 - Email from 2015 regarding questions from Torrent.
- (19) ZHP02270194 - Email from 2017 regarding Monthly Teva Call.
- (20) ZHP01893902 - Email from 2017 between ZHP and Novartis regarding Project.
- (21) ZHP00310874 - Email from Novartis to ZHP regarding unidentified peaks.
- (22) ZHP02125655 - Email between ZHP and Novartis discussing Skype meetings regarding unidentified peaks.
- (23) HUAHAI-US00008050 - Email between ZHP and Teva regarding Audit).

There is nothing about the documents that justifies treatment as confidential under the protective order, especially in light of the public health interests involved. Does ZHP consent to Plaintiffs filing these documents as attachments to its letter? Please let us know by noon in order to avoid burdening us or the Court. If Plaintiffs do not hear back from ZHP in time for filing, Plaintiffs will certainly omit these documents from the docket.

Best.
Chris

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